



December 11, 2020

STATUS REPORT

Via E-filing

United States District Court
Eastern District of Pennsylvania
Honorable Joshua D. Wolson
601 Market Street
Room 3809
Philadelphia, PA 19106-1726

RE: Lisa Barbounis v. The Middle East Forum
No. 2:19-cv-05030-JDW

Dear Judge Wolson:

Please allow this email to serve as Plaintiff's status report in connection with the December 4, 2020 Order.

The parties through counsel held a telephone conference December 10, 2020 in order to discuss outstanding discovery obligations pursuant to the December 4, 2020 Order. Plaintiff is hereby filing this Status Report in connection with the Telegram messages and the redactions that are identified in the December 4, 2020 Order.

Defendants have provided Plaintiff with a list of documents that are all Instagram and Twitter messages that Cornerstone redacted. These documents did NOT come from Plaintiff's 2 devices that were imaged by Capsicum in February 2020. The redacted documents identified by Defendants came directly from Plaintiff's Instagram and Twitter accounts. Plaintiff has contacted Cornerstone to discuss a process for underacting the documents identified by Defendants. Cornerstone has taken a firm position that they will not assist Plaintiff in any other way other than described by Plaintiff in previous status reports – which is that Cornerstone will provide Plaintiff with the imaged files and software for viewing the contents.

Plaintiff's counsel has retained Capsicum in order to help with the production of information identified in the December 4, 2020 Order. Plaintiff has also taken steps to obtain the imaged contents of her Twitter and Instagram accounts using a desktop application and exporting all data from both the Twitter and Instagram accounts. Plaintiff has also used the desktop application to export all data from Telegram. Plaintiff plans to either provide Capsicum with the imaged contents of the Twitter, Instagram, and Telegram accounts and allow Capsicum to help with identifying the discoverable information and its production, or, Plaintiff will produce this information directly to Defendants.

Plaintiff is working with this information currently to satisfy her obligations under the December 4, 2020 Order. Plaintiff is working with Capsicum to satisfy all discovery obligations forthwith in accordance with the December 4, 2020 Order.

As the December 4, 2020 Order requires Plaintiff to engage Cornerstone to help with the redacted documents, Plaintiff is filing this status report to inform the Court and Defendants know that Cornerstone will not assist with this aspect of the Court Order, but that Plaintiff is confident that she will be able to produce the information, which are the redacted documents, and the Telegram messages.

Very Truly Yours,

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
Seth D. Carson, Esquire

CC: All parties through ECF

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Status Report was served via the Court's ECF filing system:

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BY: /s/ Seth D. Carson

SETH D. CARSON

DATED: December 9, 2020